

## REMARKS

Prior to applicants' last Amendment, Examiner Cao stated that applicants proposed amendments should overcome the prior art. Applicants made the amendments but received another Office Action rejecting all of the claims. While applicants believe that the prior amendments overcame the prior art, Applicants have further amended the claims herein to better define the claimed invention over the prior art.

### Rejection based on 35 U.S.C. 112

Claim 20 stands rejected under 35 U.S.C. 112, second paragraph, as being indefinite.

Due to a formatting error, there was extra language copied between the end of claim 20 and the beginning of claim 21 that should not have been included. Applicants have deleted the incorrect wording to correct this error. Therefore, Applicants respectfully request that the rejection to claim 20 be withdrawn.

### Rejection of the claims based on the Sheard reference

1. Claims 1-10, 14, 18, 20-31, 35, 37 and 39-40 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,208,345 B1 to Sheard et al.

The Sheard reference teaches a visual data integration system architecture. The Office Action correctly states that the Sheard reference does not explicitly teach a network integration layer that provides both an option for foreign protocol integration and an option for a protocol translation service. The Office Action further states that the Sheard reference teaches an adapter for each application to convert the content of data from one format to a common format, and from the common format to an expected format, Fig. 1, adapter 34b, col. 8, lines 25-43. The Office Action states that each data type includes an informational content component and a format component, wherein the format component may be defined to include a protocol, col. 7, lines 44-65. The Office Action concludes that it would have been obvious to one of ordinary skill in the art that

Sheard teaches a network integration layer that provides an option for foreign protocol integration for converting a node to support a dominant network protocol not native to the node and a protocol translation service for converting the protocol. Applicants respectfully disagree.

It would not have been obvious to one of ordinary skill in the art that the Sheard reference teaches to convert a node to support a dominant network protocol not native to the node. The adapter 34b with Application #2 cited by the Office Action as support for converting a node may teach converting a format component of a protocol. Sheard does not teach, however, how to convert a node generally and does not teach specifically how to convert a node, without converting a protocol, to support a dominant network protocol not native to the node. Rather, adapter 34b “reformulates the informational content ‘A’ having a common representation to a format ‘B’ representation which is compatible with Application #2.” Col. 8, lines 29-32. This reformulation of the information content ‘A’ does not teach or suggest the node protocol conversion as claimed. To further distinguish the invention over Sheard, Applicants have amended independent claims 1, 23, 26, and 27 to better recite that the “foreign protocol integration” converts “a node, without converting a protocol”.

The Sheard references fails to teach or even suggest a system or method which includes both the option of converting a node, not a protocol, to support a dominant network protocol not native to the node and an option for a protocol translation service for converting a protocol. At best, the Sheard reference teaches the option of protocol translation. Applicants believe that it would be non-obvious to include both options in the network integration layer, where one option does not convert the protocol. If one of the options were included, the other option would be unnecessary. For example, if a protocol translation service was included, a node conversion protocol would not be necessary or even contemplated since the protocol conversion could account for different node types, thereby removing the need to convert the node. Thus, applicants believe that the combination of both options in the network integration layer as claimed is not obvious over the cited art. For at least the reasons discussed with regard to

amended claims 1, 23, 26, and 27, Applicants respectfully request that the rejection to claims 1-10, 14, 18, 21-31, 35 and 37 be withdrawn.

2. Claims 11-12 and 32-33 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,208,345 B1 to Sheard et al. in view of U.S. Application No. 2002/0035577 A1 to Bordersen et al. Amendments to the claims overcome this rejection.

Bordersen et al. disclose a method and system for collecting, storing and retrieving data in a database management system. The method and system maintain a partially replicated database in such a way that updates made to a central database, or to another partially replicated database are selectively propagated to the partially replicated database. Updates are propagated to the partially replicated database if the owner of the partially replicated database is deemed to have visibility as determined by rules stored in a ruled database.

Claims 11-12 depend from amended claim 1 and claims 32-33 depend from amended claim 27. Neither Sheard et al. nor Bordersen et al., alone or in combination, disclose or suggest, the recited feature of an integration framework wherein a network integration layer provides both an option for foreign protocol integration for converting a node to support a dominant network protocol not native to the node and an option for a protocol translation service for converting a protocol. The “foreign protocol integration” converts “a node, without converting a protocol”. Therefore, for at least this reason, Applicants respectfully request that the rejection to claims 11-12 and 32-33 be withdrawn.

3. Claims 13 and 34 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Sheard et al. in view of Bordersen et al. and further in view of U.S. Patent No. 5,596,744 to Dao et al. Amendments to the claims overcome this rejection.

Dao et al. disclose an architecture and system which are flexible for integrated access to heterogeneous database management systems dispersed over a long haul network to allow access to a wide variety of database systems while maintaining an autonomous underlying database system.

Claim 13 depends from amended claim 1 and claim 34 depends from amended claim 27. Neither Sheard et al., Bordersen et al., nor Dao et al., alone or in combination, disclose or suggest, the recited feature of an integration framework wherein a network integration layer provides both an option for foreign protocol integration for converting a node to support a dominant network protocol not native to the node and an option for a protocol translation service for converting a protocol. The “foreign protocol integration” converts “a node, without converting a protocol”. Therefore, for at least this reason, Applicants respectfully request that the rejection to claims 13 and 34 be withdrawn.

4. Claims 15-17 and 36 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Sheard et al. in view of U.S. Patent No. 6,041,362 to Mears et al. Amendments to the claims overcome this rejection.

Mears et al. discloses a method and system that provides a web client interface that connects through an enterprise network to an application integrating server such as a Hyper-Text Transfer Protocol (HTTP) server.

Claims 15-17 depend from amended claim 1 and claim 36 depends from amended claim 27. Neither Sheard et al. nor Mears, alone or in combination, disclose or suggest, the recited feature of an integration framework wherein a network integration layer provides both an option for foreign protocol integration for converting a node to support a dominant network protocol not native to the node and an option for a protocol translation service for converting a protocol. The “foreign protocol integration” converts “a node, without converting a protocol”. Therefore, for at least this reason, Applicants respectfully request that the rejection to claims 15-17 and 36 be withdrawn.

**CONCLUSION**

Applicants submit that all of the pending claims are in condition for allowance and notice to this effect is respectfully requested. The Examiner is invited to call the undersigned if it would expedite the prosecution of this application.

Respectfully submitted,

  
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